REMARKS

Applicants respectfully request further examination and reconsideration in view of the arguments set forth fully below. Claims 1-4, 6-10, 27-29, 31 and 38 were previously pending in this application. Within the Office Action, Claims 1-4, 6-10, 27-29, 31 and 38 have been rejected. Accordingly, Claims 1-4, 6-10, 27-29, 31 and 38 are currently pending.

<u>Rejections Under 35 U.S.C. § 103</u>

Within the Office Action, Claims 1-3, 6-10, 27-29 and 31 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 7,051,275 to Gupta et al. (hereinafter "Gupta") in view of Official Notice. The applicants respectfully disagree.

Gupta teaches annotations for multiple versions of media content. Multiple different versions of the same multimedia content are available to a multimedia server, and an annotation server maintains annotations corresponding to the multimedia content, each annotation corresponding to each of the different versions of the multimedia content. [Gupta, Abstract] The video streams can differ in a variety of manners such as quality, modified timelines, and speed factors. [Gupta, col. 7, lines 53-64] However, Gupta does not teach generating a second copy of the media data in the personal information space, the second version including an update not included in the first version. Gupta also does not teach obtaining difference information comprising differences between the first copy of the media data and the second copy of the media data. Furthermore, Gupta does not teach an application data store holding a copy of a previous state of the digital media in the personal information store. Gupta also does not teach a device engine comparing at least one change in a record in said personal information store to said record in said application data store and generating an output file including at least one delta of digital media changed in the personal information store relative to the copy of the digital media in the system data store.

Within the Office Action, Gupta, col. 4, is cited as teaching generating a second copy of the media data in the personal information space, the second version including an update not included in the first version and obtaining difference information comprising differences between the first copy of the media data and the second copy of the media data. Gutpa, Col. 4, is also cited as teaching an application data store holding a copy of a previous state of the digital media in the personal information store and a device engine comparing at least one change in a record in said personal information store to said record in said application data store and generating an

output file including at least one delta of digital media changed in the personal information store relative to the copy of the digital media in the system data store. Applicants respectfully disagree that Gupta, col. 4 teaches these limitations. The first paragraph of Gupta, col. 4, teaches the annotation server and how it communicates such as via HTTP or SMTP. The second paragraph of Gupta, col. 4, teaches annotations which are able to correspond to streaming or pre-delivered media. The third paragraph of Gupta, col. 4, teaches the process of a user accessing a page containing streaming media and how the browser contacts the annotation server. The fourth paragraph of Gupta, col. 4, teaches general computer information. The fifth paragraph of Gupta, col. 4, teaches a general example of a computer. The sixth paragraph of Gupta, col. 4, teaches a computer with internal components such as a processor and memory. The seventh paragraph of Gupta, col. 4, which is only a partial paragraph that continues on to col. 5, teaches more specifics about a computer such as describing the memory in more detail.

Thus, clearly, nothing of column 4 of Gupta teaches or makes obvious generating a second copy of the media data in the personal information space, the second version including an update not included in the first version. Similarly, nothing in column 4 of Gupta teaches obtaining difference information comprising differences between the first copy of the media data and the second copy of the media data. Furthermore, nothing in column 4 of Gupta teaches an application data store holding a copy of a previous state of the digital media in the personal information store. Additionally, nothing in column 4 of Gupta teaches a device engine comparing at least one change in a record in said personal information store to said record in said application data store and generating an output file including at least one delta of digital media changed in the personal information store relative to the copy of the digital media in the system data store.

Although applicants do not agree with the Official Notice, it is only cited as teaching the storage being personal information space/store. Thus, Official Notice does not add anything with respect to the limitations described above that Gupta clearly does not teach.

In contrast to the teachings of Gupta, Official Notice and their combination, the present invention is directed to a method and system for synchronizing media data on devices including maintaining a personal information space identified with a user where the personal information space includes media data and transferring at least a portion of the media data from the personal information space to another device on the network in a differencing transaction in response to a user request. As described above, Gupta, Official Notice and their combination do not teach generating a second copy of the media data in the personal information space, the second version

including an update not included in the first version. Gupta, Official Notice and their combination also do not teach obtaining difference information comprising differences between the first copy of the media data and the second copy of the media data. Furthermore, Gupta, Official Notice and their combination do not teach an application data store holding a copy of a previous state of the digital media in the personal information store. Gupta, Official Notice and their combination also do not teach a device engine comparing at least one change in a record in said personal information store to said record in said application data store and generating an output file including at least one delta of digital media changed in the personal information store relative to the copy of the digital media in the system data store.

The independent Claim 1 is directed to a method of transferring media data to a network coupled apparatus. The method of Claim 1 comprises maintaining a personal information space identified with a user including media data, the personal information space being coupled to a network, generating a first copy of the media data in the personal information space, generating a second copy of the media data in the personal information space, the second version including an update not included in the first version, obtaining difference information comprising differences between the first copy of the media data and the second copy of the media data and transferring the difference information from the personal information space to the network coupled apparatus in response to a user request. As described above, Gupta, Official Notice and their combination do not teach generating a second copy of the media data in the personal information space, the second version including an update not included in the first version. Gupta, Official Notice and their combination also do not teach obtaining difference information comprising differences between the first copy of the media data and the second copy of the media data. For at least these reasons, the independent Claim 1 is allowable over the teachings of Gupta, Official Notice and their combination.

Claims 2, 3 and 6-10 are all dependent on the independent Claim 1. As described above, the independent Claim 1 is allowable over the teachings of Gupta, Official Notice and their combination. Accordingly, the Claims 2, 3 and 6-10 are all also allowable as being dependent on an allowable base claim.

The independent Claim 27 is directed to a system for transferring digital media between a plurality of network coupled devices. The system of Claim 27 comprises a personal information store containing digital media readable by an application program and a processing device associated with the personal information store, the processing device including: an application data store holding a copy of a previous state of the digital media in the personal information store

and a device engine comparing at least one change in a record in said personal information store to said record in said application data store and generating an output file including at least one delta of digital media changed in the personal information store relative to the copy of the digital media in the system data store. As described above, Gupta, Official Notice and their combination do not teach an application data store holding a copy of a previous state of the digital media in the personal information store. Gupta, Official Notice and their combination also do not teach a device engine comparing at least one change in a record in said personal information store to said record in said application data store and generating an output file including at least one delta of digital media changed in the personal information store relative to the copy of the digital media in the system data store. For at least these reasons, the independent Claim 27 is allowable over the teachings of Gupta, Official Notice and their combination.

Claims 28, 29 and 31 are all dependent on the independent Claim 27. As described above, the independent Claim 27 is allowable over the teachings of Gupta, Official Notice and their combination. Accordingly, the Claims 28, 29 and 31 are all also allowable as being dependent on an allowable base claim.

Within the Office Action, Claims 4 and 38 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Gupta and Official Notice in view of U.S. Patent Publ. No. 2002/0091785 to Ohlenbusch et al. (hereinafter Ohlenbusch). The applicants respectfully disagree.

Claims 4 and 38 are dependent on the independent Claim 1. As described above, the independent Claim 1 is allowable over the teachings of Gupta, Official Notice and their combination. Accordingly, the Claims 4 and 38 are also allowable as being dependent on an allowable base claim.

Within the Office Action, Claims 1-3, 6-10, 27-29 and 31 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publ. No. 2002/0049852 to Lee (hereinafter Lee) in view of Official Notice. The applicants respectfully disagree.

Lee teaches a method/system for creating, delivering, reassembling, rendering, and storing asynchronous and synchronous multimedia message. Lee integrates video/audio streaming with existing Internet/Intranet email messaging and video/audio conferencing systems. The method taught in Lee enables electronic multimedia messaging on video/audio capture-equipped mobile platform with limited pre-installed software capability or memory footprint. [Lee, Abstract] Thus, Lee clearly teaches an implementation of video email. However, Lee does not teach generating a second copy of the media data in the personal information space,

the second version including an update not included in the first version. Lee also does not teach obtaining difference information comprising differences between the first copy of the media data and the second copy of the media data. Furthermore, Lee does not teach an application data store holding a copy of a previous state of the digital media in the personal information store. Lee also does not teach a device engine comparing at least one change in a record in said personal information store to said record in said application data store and generating an output file including at least one delta of digital media changed in the personal information store relative to the copy of the digital media in the system data store.

Within the Office Action, Lee, page 4 is cited as teaching generating a second copy of the media data in the personal information space, the second version including an update not included in the first version and obtaining difference information comprising differences between the first copy of the media data and the second copy of the media data. Lee, page 4 is also cited as teaching an application data store holding a copy of a previous state of the digital media in the personal information store and a device engine comparing at least one change in a record in said personal information store to said record in said application data store and generating an output file including at least one delta of digital media changed in the personal information store relative to the copy of the digital media in the system data store. Applicants respectfully disagree that Lee, page 4 teaches these limitations. Page 4 of Lee teaches a Universal Audio/Video Rendering Manager, a Streaming Media Publishing Manager, a Distributing Media Manager, a Video Phone Control Manager and an Unattended Streaming Advertisement Manager. None of these teach the limitations above. Lee is clearly focused on sending video via email.

Thus, clearly, nothing of page 4 of Lee teaches or makes obvious generating a second copy of the media data in the personal information space, the second version including an update not included in the first version. Similarly, nothing in page 4 of Lee teaches obtaining difference information comprising differences between the first copy of the media data and the second copy of the media data. Furthermore, nothing in page 4 of Lee teaches an application data store holding a copy of a previous state of the digital media in the personal information store. Nothing in page 4 of Lee teaches a device engine comparing at least one change in a record in said personal information store to said record in said application data store and generating an output file including at least one delta of digital media changed in the personal information store relative to the copy of the digital media in the system data store.

Although applicants do not agree with the Official Notice, it is only cited as teaching the storage being personal information space/store. Thus, Official Notice does not add anything with

respect to the limitations described above that Lee clearly does not teach.

In contrast to the teachings of Lee, Official Notice and their combination, the present invention is directed to a method and system for synchronizing media data on devices including maintaining a personal information space identified with a user where the personal information space includes media data and transferring at least a portion of the media data from the personal information space to another device on the network in a differencing transaction in response to a user request. As described above, Lee, Official Notice and their combination do not teach generating a second copy of the media data in the personal information space, the second version including an update not included in the first version. Lee, Official Notice and their combination also do not teach obtaining difference information comprising differences between the first copy of the media data and the second copy of the media data. Furthermore, Lee, Official Notice and their combination do not teach an application data store holding a copy of a previous state of the digital media in the personal information store. Lee, Official Notice and their combination also do not teach a device engine comparing at least one change in a record in said personal information store to said record in said application data store and generating an output file including at least one delta of digital media changed in the personal information store relative to the copy of the digital media in the system data store.

The independent Claim 1 is directed to a method of transferring media data to a network coupled apparatus. The method of Claim 1 comprises maintaining a personal information space identified with a user including media data, the personal information space being coupled to a network, generating a first copy of the media data in the personal information space, generating a second copy of the media data in the personal information space, the second version including an update not included in the first version, obtaining difference information comprising differences between the first copy of the media data and the second copy of the media data and transferring the difference information from the personal information space to the network coupled apparatus in response to a user request. As described above, Lee, Official Notice and their combination do not teach generating a second copy of the media data in the personal information space, the second version including an update not included in the first version. Lee, Official Notice and their combination also do not teach obtaining difference information comprising differences between the first copy of the media data and the second copy of the media data. For at least these reasons, the independent Claim 1 is allowable over the teachings of Lee, Official Notice and their combination.

Claims 2, 3 and 6-10 are all dependent on the independent Claim 1. As described above, the independent Claim 1 is allowable over the teachings of Lee, Official Notice and their combination. Accordingly, the Claims 2, 3 and 6-10 are all also allowable as being dependent on an allowable base claim.

The independent Claim 27 is directed to a system for transferring digital media between a plurality of network coupled devices. The system of Claim 27 comprises a personal information store containing digital media readable by an application program and a processing device associated with the personal information store, the processing device including: an application data store holding a copy of a previous state of the digital media in the personal information store and a device engine comparing at least one change in a record in said personal information store to said record in said application data store and generating an output file including at least one delta of digital media changed in the personal information store relative to the copy of the digital media in the system data store. As described above, <u>Lee, Official Notice and their combination do not teach an application data store holding a copy of a previous state of the digital media in the personal information store. Lee, Official Notice and their combination also do not teach a device engine comparing at least one change in a record in said personal information store to said record in said application data store and generating an output file including at least one delta of digital media changed in the personal information store relative to the copy of the digital media in the system data store.</u> For at least these reasons, the independent Claim 27 is allowable over the teachings of Lee, Official Notice and their combination.

Claims 28, 29 and 31 are all dependent on the independent Claim 27. As described above, the independent Claim 27 is allowable over the teachings of Lee, Official Notice and their combination. Accordingly, the Claims 28, 29 and 31 are all also allowable as being dependent on an allowable base claim.
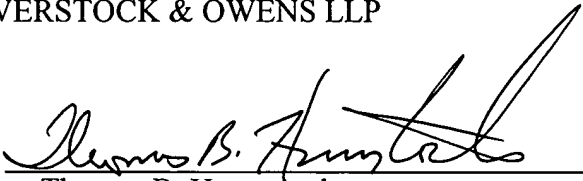
Within the Office Action, Claims 4 and 38 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Lee and Official Notice in view of Ohlenbusch. The applicants respectfully disagree.

Claims 4 and 38 are dependent on the independent Claim 1. As described above, the independent Claim 1 is allowable over the teachings of Lee, Official Notice and their combination. Accordingly, the Claims 4 and 38 are also allowable as being dependent on an allowable base claim.

For these reasons, Applicants respectfully submit that all of the claims are now in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, they are encouraged to call the undersigned at (408) 530-9700 to discuss the same so that any outstanding issues can be expeditiously resolved.

Respectfully submitted,

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By: _____

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